

From: [San Luis Valley Ecosystem Information](#)
To: [Rankin, Dennis - Washington, DC](#)
Cc: ["Beth Hall"; "Laura Mezoff"; "Christine Canaly"](#)
Subject: San Luis Valley/Tri-State transmission Comments
Date: Monday, September 21, 2009 7:10:51 PM
Attachments: [Tristate Scoping_09 21 09 \(2\).doc](#)
[SandHillCraneDistribution.1.doc](#)

Dear Mr. Rankin;

Please accept these attached comments and support material on behalf of the San Luis Valley Ecosystem Council and San Luis Valley Water Protection Coalition. Re: San Luis Valley Electric System Improvement Project.

Thanks for your time and consideration. Please let us know you received these comments and support material.

Sincerely,

Christine Canaly, Director
San Luis Valley Ecosystem Council
P.O. Box 223
Alamosa, CO 81101
(719) 589-1518

"Where the forest watchers meet the river keepers"

Tri-State Generation and Transmission Association
Delivered via electronic mail (dennis.rankin@wdc.usda.gov)

September 21, 2009

Dennis Rankin
Environmental Protection Specialist
USDA Rural Utilities Service
1400 Independence Avenue, SW
Stop 1571
Washington, DC 20250-1571

Re: San Luis Valley Electric System Improvement Project

Dear Mr. Rankin:

Please accept and genuinely consider these scoping comments on behalf of the San Luis Valley Ecosystem Council and the Citizens for San Luis Valley Water Protection Coalition. We serve the six county area of the San Luis Valley basin in South Central Colorado. We provide public policy recommendations for the entire Rio Grande Headwaters in CO, an area encompassing over 8,100 square miles. Thank you for taking the time to review these comments.

San Luis Valley Ecosystem Council (SLVEC)

The mission of SLVEC is to protect and restore—through research, education, and advocacy—the biological diversity, ecosystems, and natural resources of the Upper Rio Grande bioregion, balancing ecological values and human needs. SLVEC works as the only local public lands advocacy organization that is concerned about protecting and restoring intact ecosystems and wildlife corridors, from the mountain peaks to the rivers along the valley floor, and into New Mexico.

Since 1995 SLVEC has been serving the San Luis Valley, which is surrounded by 3.1 million acres of public lands that includes the Great Sand Dunes National Park, the Rio Grande National Forest, three National Wildlife Refuges, numerous State Wildlife Areas, 230,000 acres of wetlands- the most extensive system in the Southern Rocky Mountains, and some of Colorado's most remote wilderness. SLVEC originally formed to offer input for the Revised Management Plan of the Rio Grande National Forest (RGNF). Today it stands as a voice for citizens concerned about threats from increased motorized recreation, destructive timber sales, unbridled development, oil and gas development, and most recently, utility scale solar power facilities and transmission lines. SLVEC has established a reputation for bringing a strong environmental voice that finds workable solutions to the rural, conservative, public arena. SLVEC has approx. 500 members and a mailing list of 4,000 supporters.

Citizens for San Luis Valley Water Protection Coalition (WPC) is a grassroots organization representing a broad spectrum of interests. It's members are united by the belief that the vital ecological, wildlife, cultural, agricultural and water resources of the upper Rio Grande and Closed Basins of the San Luis Valley should not be jeopardized by destructive industrialization of any kind. By working with communities, local government and organizations, WPC is actively

engaged in promoting an emerging culture of sustainability in the San Luis Valley that is responsive to climate change while protecting the vital natural resources that maintain the healthy functioning of ecosystem processes and services.

We encourage both a national and a regional conversation on energy use and, especially, on fossil fuels and their impacts to climate change. It is imperative that our country makes the transition to the use of renewable energy sources. The warming effects are being felt in the San Luis Valley, as in other parts of the world, and are impacting wildlife, water supplies, and forest health.

We believe that renewable energy can offer a clean, affordable, sustainable, and environmentally friendly alternative. We support a measured approach, however, to the switch to alternatives.

We recognize the unique and valuable aspects of the San Luis Valley. We understand that the Valley has enormous potential in the area of solar production, and has a long history of supporting solar energy on a smaller scale. We encourage the development of renewable energy strategies that will promote the long-term health and well being of the community, and protect the environment, critical habitat, wildlife, sensitive corridors, and water, as well as the history and culture of this agro-pastoral community.

We urge Tri-State Transmission Services and Xcel Energy to take a long term view when considering the building of new transmission lines that will be required to accommodate Utility Scale Solar development in a culturally and ecologically sensitive area like the San Luis Valley (SLV). It is imperative that solar development remain **responsible and that renewable energy development does not compromise this area's unique values.**

We recommend a national model of appropriate energy development based on what is currently being implemented in European countries. They appear to exercise a three fold strategy; emphasis on flexibility in size and scale fitted to location and need, constructing open ended systems that can rapidly integrate new technologies, and suitably subsidizing research and development that encompasses a range of alternative energy sources.

Thank you for considering these scoping comments and for your commitment to prioritize and bring the possibility of responsible renewable energy development to our nation's infrastructure. We look forward to a continual interchange of ideas and information throughout this process.

I. Historic Resources:

Special Management Areas-Sangre de Cristo National Heritage Area

The Notice of Availability identified a number of different types of Special Management Areas (SMA's). Areas in the National Landscape Conservation System including National Heritage Areas are governed by other laws requiring protection as a priority to protect objects of historic or scientific interest, and must be managed to protect those values as a priority over other uses. NHA Legislation has recently been passed including the counties of Conejos, Costilla and Alamosa counties.

There are several important historic resources located within the proposed transmission corridor plans. These include the Sangre de Cristo National Heritage Area, designated by Congress earlier this year, and the Los Caminos Antiguos Scenic By-way. Because of these two special designations, we feel it is important to preserve the visual landscape, and feel that the transmission line would *not* serve the historic integrity of the area.

N-009-001: Cultural, Historic, and Arch (In Review)

Your email/letter/comment form has been received and your comment noted. Potential impacts to and mitigation measures regarding cultural, historic, and archaeological resources from the proposed project will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at

<http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-001

The mission of the *Sangre de Cristo National Heritage Area (NHA)* is to promote, preserve, protect and interpret the profound historical, religious, environmental, geographic, geologic, cultural and linguistic resources. These efforts will contribute to the overall national story, engender a spirit of pride and self-reliance, and create a legacy in the Colorado counties of Alamosa, Conejos, and Costilla.

The geologic resources found in the NHA are directly associated with human habitation. The layered water systems first brought in game that attracted many Native tribes to the area, going back 12,000 years. Hispanic settlers from the south were enticed by the water to raise crops and sheep. This area boasts the oldest town in Colorado (San Luis), the oldest parish in Colorado (Our Lady of Guadalupe), and the oldest water rights in Colorado. Anglo ranchers and farmers raised cattle and wheat, and present-day crops of alfalfa, potatoes, and lettuce. **The geographic isolation of the area has essentially preserved cultural identity of those groups.**

N-009-002 | Historically, the SLV area was a crossroads of culture. Mt. Blanca, southeast of the Great Sand Dunes, marks the eastern boundary of the Navajo. Mt. Blanca is considered one of four mountain peaks in the four corner area to be sacred among various tribes who inhabited and traded in this area. **We recommend the consultation with tribes should be an integral part of this public process, as the construction of the proposed transmission line would have adverse impacts to this sacred area.**

N-009-003 | In addition to the above-mentioned special designations, historic resources also include the Fort Garland Museum and old Fort Garland, which is in the current proposed transmission corridor. The original site of Fort Massachusetts (the predecessor to Fort Garland) and a historic cemetery, which contains the remains of the contemporary of Kit Carson, frontiersman Tom Tobin, are located on private land belonging to the Trinchera Ranch, but have been accessible to historic groups and tours wishing to study the area, and would also be impacted by the proposed line.

N-009-004 | The Rio Grande Scenic Railroad, which runs from Alamosa to La Veta, was begun three years ago as a tourist line between Alamosa and La Veta. It follows the old railroad line over La Veta Pass, but from Alamosa to Fort Garland, the route would be contiguous to the proposed transmission line. This railway is historic, and part of the appeal is that the line being traveled is over 100 years old. The proposed transmission line would seriously affect the viewshed and historic integrity of the railroad, which may have economic impacts, as well.

II. Threatened, endangered and sensitive species habitat, as well as critical cores and linkages for wildlife habitat

Excerpts from Sangre de Cristo National Heritage Area feasibility Study
Wetlands and waterfowl

N-009-005 | Within the Sangre de Cristo NHA, a mixture of wetland communities including, creek bottom, permanent and seasonal ponds, upland shrublands and playa wetlands provide breeding and migration habitat for raptors, songbirds, waterbirds and waterfowl. Wetlands are often found in areas where groundwater, from the aquifer, move towards low-lying areas and surfaces on the landscape.

Globally significant Flora and Fauna

A number of plant, plant community and animal species found in the Sangre de Cristo NHA have been recognized by the Colorado Natural Heritage Program (CNHP) as globally significant. These species have received a G1 to G3 rating, meaning they are vulnerable to extinction due to a very small population size, a very restricted range, or other biological factors.

N-009-002: NEPA Process (In Review)

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RUS is the lead federal agency for NEPA, and will consult with other federal, state, and local agencies, and affiliated tribes as well as adhere to applicable regulations.

Additional information regarding the NEPA process can be found on the RUS project website at <http://www.usda.gov/rus/water/ees/envIRON.htm>. The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-003: Cultural, Historic, and Arch (In Review)

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N-009-004: Cultural, Historic, and Arch (In Review)

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The Environmental Impact Statement is anticipated to be completed in

N-009-006	<p>Animals:</p> <p>Southwestern willow flycatcher-(<i>empidonax trailii extremus</i>), a federally endangered songbird inhabits riparian vegetation within the San Luis Valley. This songbird migrates and nests in dense willow and cottonwood areas throughout the SLV, including areas that are within the Sangre de Cristo NHA.</p>
N-009-007	<p>The following species are also found within the Sangre de Cristo NHA and have been identified as “sensitive” by federal agencies. The sensitive designation indicates that the species’ population viability is a concern.</p> <ul style="list-style-type: none"> Greater sandhill crane (Forest Service) <i>see map of flyway group</i> White-faced Ibis (FS/BLM)
N-009-008	<p>Plants:</p> <p>Slender spiderflower (<i>Cleome multicaulis</i>)- a globally imperiled plant found in the transition areas between wet meadows and the adjacent silt grass/greasewood uplands throughout the NHA. (CNHP 1998). Although once widespread in the southern Rocky Mountains, this species now occurs almost exclusively in the San Luis Valley. The San Luis Valley contains the most numerous, largest, and healthiest populations of the species in the world.”</p>
N-009-009	<p>Since the entire Valley floor appears to be high potential for solar development, key potential conflicts need to be identified throughout the Valley and beyond. Below are the <u>most significant from an ecological/conservation perspective based on preliminary public lands analysis, and for which data was available</u>. Since a large portion of this proposed transmission line traverses across private land, baseline data will be more difficult to compile. Areas that we think need to be focused on are as follows:</p> <ul style="list-style-type: none"> Bald eagle roost sites and winter concentration areas Bighorn sheep production areas and severe winter range Gunnison sage-grouse production Areas, severe winter Range, winter Range, and overall range Globally imperiled plants and natural communities as ranked by CNHP Riparian areas Potential Conservation Areas as identified by the CNHP Sandhill crane habitat Thank you for including the following species for study in the Macro Corridor Report “Species listed as threatened and endangered that may occur within the counties included in the Project study area include Mexican spotted owl (<i>Strix occidentalis lucida</i>), southwestern willow flycatcher (<i>Empidonax trailii extimus</i>), boreal toad (<i>Bufo boreas boreas</i>), whooping crane (<i>Grus americana</i>), the candidate yellow-billed cuckoo (<i>Coccyzus americanus</i>), and the Canada lynx (<i>Lynx canadensis</i>).”
N-009-010	<p>Further, it needs to be stated that the proposed transmission corridor through La Veta Pass would be targeting an area for which few studies have been completed in terms of biologic resources. We believe that this area, which has remained relatively undeveloped for generations, needs further study in this regard.</p>
N-009-011	<p>For this reason and other recommendations cited in these comments, we strongly urge going from an Environmental Assessment (EA) to an Environmental Impact Statement (EIS) analysis.</p>

III. Environmental Impact Statement

This section was prepared by Western Resource Advocates. (WRA). We too want to strongly emphasize this request.

late 2010 and will be available at
<http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-005: Wildlife (In Review)

Your email/letter/comment form has been received and your comment noted. Potential impacts to wildlife from the proposed project and mitigation measures will be addressed in the Environmental Impact Statement.

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<http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-006: Wildlife (In Review)

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<http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-007: Wildlife (In Review)

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<http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-008: Vegetation (In Review)

Your email/letter/comment form has been received and your comment

N-009-012

“The Project Scoping Notice states that an Environmental Assessment is being prepared to determine whether a full Environmental Impact Statement (EIS) is warranted. We (SLVEC/WPC) respectfully request that an EIS be prepared for this project. An EIS is required when a proposed action will likely have significant impacts to the human environment.

N-009-013

Tri-State is proposing nearly 150 miles of high voltage transmission lines from San Luis Valley, over the Sangre de Cristo Mountains to a new substation near Walsenburg, CO and then terminating at the Comanche substation near Pueblo, CO. In addition to Great Sand Dunes National Park in the Valley, a National Heritage Area designation, world class mountain terrain and views and numerous national wildlife refuges, the project area contains outstanding visual, wildlife and natural resource attributes. Nearly 100 miles are proposed to be double-circuit 230 kV (San Luis Valley to Walsenburg) and 45 miles at double circuit 345 kV (Walsenburg to Comanche substations). The preliminary corridors for the new power lines average 2-3 miles in width and eventual rights-of-way will directly and permanently affect a 500 foot or great swath for the 150 miles. The power line towers are projected to range 115 to 150 in height, and in San Luis Valley itself, the proposed corridor alignment does not have existing power lines.

Under these circumstances with these natural resources at stake, the Project’s potential impacts certainly qualify as “significant” to the human environment and warrant a full EIS. As discussed below under “cumulative actions” the double-circuit 230 kV lines into San Luis Valley may facilitate up to 800 MW of concentrating solar power generation. The cumulative lands, soils, vegetation, wildlife and water impacts of this generation that will be directly facilitated by the new power lines adds to the finding of “significant.” See 40 C.F.R. §§ 1508.27(b)(7); 1506.2.

N-009-014

Finally, NEPA defines “significant” as not only the intensity of the proposed action and the unique natural resources at issue, but also as the extent to which the action “may establish a precedent for future actions with significant impacts.” See 40 C.F.R. § 1508.27(b)(6). WRA asks that in determining that an EIS is warranted, RUS consider the current political, public policy and economic context in Colorado. This includes developing Colorado’s new energy economy which will require significant new transmission investments in remote Colorado areas as well as the development of potentially thousands of megawatts of solar development. However, the power lines needed for renewable energy will be in remote areas that presently do not have any transmission facilities. Consequently, the new transmission investments to facilitate large-scale renewable energy projects – particularly in the case of utility scale solar projects – will carry new impacts to assess, disclose, avoid and minimize through mitigation. All told, therefore, the direct, indirect and cumulative actions of the proposed action are significant and precedent setting, and therefore deserving of an EIS.”

IV. Costs to the Local Economy

N-009-015

The Tri-State Corridor study did not adequately address the economic impacts from the construction of this high-voltage power line. These include:

- a. Loss of property value due to proximity of high-voltage lines
- b. Loss of property tax revenue from property that is seized through the process of eminent domain;
- c. Potential loss of income from tourism to historic sites and by-ways
- d. The San Luis Valley in particular actively maintains the strong economic and cultural values based on agriculture and ranching. The Valley produces 92% of the potatoes grown in Colorado, which ranks fourth among potato producing states in the U.S. Local economic benefits of developing transmission corridors through agricultural land needs to be considered.

noted. Potential impacts to vegetation from the proposed project and mitigation measures will be addressed in the Environmental Impact Statement.

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N-009-009: Wildlife (In Review)

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N-009-010: NEPA Process (In Review)

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N-009-016

V. Health Effects

Several studies have found health affects associated with exposure to electro-magnetic fields, even at relatively low levels. These health affects include childhood cancers, leukemia, and neuro-degenerative diseases. (See Carpenter). The Sierra Grande School is in the proposed transmission corridor, and we believe that this is an unacceptable level of health risk. We also believe that much more precaution needs to be taken in addressing these well-documented health risks.

N-009-017

VI. Siting and Construction

Transmission lines

Habitat fragmentation will be caused by transmission corridors, which will be necessary to transmit power to electricity grids. Wildlife habitat fragmentation caused by transmission lines (including branch powerlines), pipelines (including feeder pipelines) and roads generally fall into three broad categories:

1. Construction impacts (access, right-of-way clearing, construction of towers, stringing of cables);
2. Line maintenance impacts (inspection and repair); and
3. Impacts related to the physical presence and operation of the transmission line.

As such, wildlife habitat must be examined on an individual project and site-specific basis. The only way to accomplish this requirement is to ensure that the transmission corridor is spatially evaluated for direct, indirect and cumulative impacts.

Specific activities that negatively impact wildlife and cause destruction of core habitat or habitat fragmentation include the construction of facilities, disturbance of soil by the use of heavy machinery, noisy machinery during construction and maintenance, removal of vegetation.

N-009-018

VII. Stakeholder Coordination of Transmission Corridor

"NEPA emphasizes early cooperation amongst federal, state and local agencies with jurisdiction or special expertise in a matter, particularly where there joint planning or permitting processes are involved. See 40 C.F.R. §§ 1501.6; 1506.2." See WRA comments.

Stakeholders are those people, agencies and organizations that have a significant interest in the outcome of this transmission line process. These parties with special interest need to include: National Park Service, which administers Special Management Areas-the Sangre de Cristo National Heritage Area Board, County Commissioners, Bureau of Land Management (BLM), National Forest Service, environmental organizations and assorted individuals along the transmission line corridor that have taken the time to respond. The BLM specifically must work closely with the designation of new corridors and Dept. of Agriculture, because of it's administration of the Solar Study Area Programmatic Environmental Impact Statement (PEIS). We have asked them through the PEIS "that BLM must complete all of the necessary NEPA analysis for those corridors, including a thorough discussion as to why the ongoing corridor designation processes will not be sufficient. In making a determination about the need for additional corridors, the BLM should commit to first coordinating with the ongoing designation processes and prioritize using those corridors, instead of designating still more corridors without coordination." **We recommend that the BLM be a cooperating agency with the Dept. of Agriculture.**

N-009-019

VIII. Comprehensive Super-Regional Planning

Resource planning for the western and eastern interconnections is crucial to an economically and environmentally sound electric grid. The planning processes for our national

N-009-011: NEPA Process (In Review)

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N-009-012: NEPA Process (In Review)

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N-009-020

grid must be fair, unbiased, science-based, broadly participatory, and transparent. In designing these processes, the traditional role of states, regional authorities and the federal government must be reappraised. Transmission is only one piece of our clean energy future; energy efficiency, demand response, energy storage, and distributed generation technologies are all resources that must be considered along with traditional central power stations that require interstate transmission. These alternative resources must be evaluated as part of a region-wide integrated resource plan, evaluated and weighed equally with new generation in making a determination of need. **New transmission lines should only be built if they are truly needed, and demand for low-carbon generation cannot be satisfied otherwise. In particular, broad deployment of small-scale renewable and low carbon distributed generation is a critical component to reducing carbon emissions, as it decreases the need for expensive new transmission lines by facilitating energy production and consumption in the same location and reduce line loadings on existing facilities.**

IX. Environmentally Responsible Corridors

N-009-021

Future transmission corridors must use the best practices developed via processes such as California's successful Renewable Energy Transmission Initiative and similar protocols. These efforts apply screening criteria to prioritize areas for development based on their suitability, and ensure that critical habitat, environmentally and culturally sensitive lands, or protected areas are excluded. Such an approach benefits all parties by clearly delineating which areas of most potential for renewable energy generation and transmission have the least conflicts, and are therefore less likely to result in conflict or litigation, an outcome that all parties would prefer to avoid. It is also imperative that the social and ecological impacts of transmission lines be assessed in full compliance with our nation's environmental laws—including the National Environmental Policy Act—and must provide the public with ample opportunities for meaningful involvement. Regional, state, and federal wildlife, lands, and resource agencies must be full partners in future transmission planning processes.

X. Being "Smarter" with Existing Infrastructure and support for Distributive Generation

Before building any new transmission, we need to make every effort to improve efficiency to negate the need for new supply, and also to better utilize existing transmission infrastructure. With this in mind, we believe foremost that the nation needs to pass additional energy conservation measures and implement more efficient technologies at all levels of supply, delivery, and end-use. Future energy demand cannot be met without ambitious efficiency gains in our buildings, appliances, industries, and transportation. We need to provide incentives for deployment of energy storage and innovative smart grid technologies. Much cost-effective and carbon-free demand reduction and conservation potential remains untapped in these areas. We must also be sure to maximize the use of the existing power grid by way of voltage and service upgrades and by making use of existing transmission infrastructure and other rights-of-way including existing pipelines, roads, and rails. Damages to private and public values from development of existing and new rights of way should be minimized and appropriately addressed.

N-009-022

It is the stated purpose of this transmission line to provide access to the SLV's renewable energy (solar) resources. We are concerned that the proposed high voltage transmission line will be used to export only electricity generated from large utility-scale solar facilities, unless care is taken to include small-scale renewable energy production into the transmission planning model.

However, in 2004, the Colorado legislature declared the importance of locally-owned

N-009-013: NEPA Process (In Review)

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N-009-014: NEPA Process (In Review)

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renewable energy generation: "It is the policy of this state to encourage local ownership of renewable energy generation facilities to improve the financial stability of rural communities." (Sec. 7-56-210(1), C.R.S.). This intent was also included in SB07-100, which, in subparagraph (2)(c), requires regulated utilities to "Consider how transmission can be provided to encourage local ownership of renewable energy facilities, whether through renewable energy cooperatives as provided in section 7-56-210, C.R.S., or otherwise."

Since locally-owned renewable energy projects are, by definition, relatively small (and must be less than 30MW to qualify for the 1.5 REC multiplier), the proposed high-voltage transmission line must take into account the needs of small energy suppliers, who could be required to build (prohibitively expensive) substations or radial lines in order to interconnect and access high-voltage transmission lines. The cost of interconnecting small projects to a high voltage system is prohibitively expensive, essentially making the new transmission line much less accessible to locally-owned projects, while simultaneously opening the door to large-scale renewable projects for which the cost of building their own distribution & transmission infrastructure is not cost-prohibitive.

N-009-023 | We respectfully recommend that small-scale energy generation be included in the transmission modeling, so that smaller scale projects are not excluded, and the New Energy Economy can benefit local communities and small-scale energy production.

N-009-024 | X. Alternative Strategies
As stated in the Tri-State proposal, the primary reasons for constructing the transmission line are:
1) to improve system reliability;
2) to help prevent high-voltage collapse under peak loads; and
3) to export any renewable energy that may be produced in the Valley in the future. We believe that all of these needs can be met in ways that are less destructive to the health, environment, historic/cultural resources, and the agro-pastoral landscape that currently exist in the San Luis Valley. We believe alternatives could also be much less expensive.

Since transmission lines are extremely expensive to build, and have huge environmental impacts, with expensive & complex permitting processes, we believe they should be built only with utmost care and only after considering all available alternatives that would have lesser impacts.

N-009-025 | We would like to see further accountability and analysis of the following criteria:
a. There are many un-tapped opportunities to improve energy efficiency and those opportunities should be maximized prior to building additional transmission lines. This NEPA analysis needs to include in a proposed alternative the creation of significant efficiency programs in the SLV that will address the valley's electricity needs while reducing the production of green house gases and obviating the need for high-cost transmission lines. These procedures must include demand side management; load shifting, and interruptible service agreements.

N-009-026 | b. An alternative that includes the analysis of building local renewable energy resources (micro-hydro, geothermal, pumped storage, etc.) to meet peak demands. These resources have been outlined by the Governor's Energy Office in the Colorado Senate Bill 07-091 Renewable Resource Generation Development Areas Task Force, which identifies locations of potential renewable energy resources in the SLV and throughout the state.

N-009-027 | c. Alternatives to irrigation needs (which currently use 82% of the energy in the SLV), thereby reducing peak load; What sort of analysis has occurred that pursues options

N-009-015: Socioeconomic Resources (In Review)

Your email/letter/comment form has been received and your comment noted. Potential impacts to social and economic resources from the proposed project and mitigation measures will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-016: Electrical Characteristics (In Review)

Your email/letter/comment form has been received and your comment noted. Electrical characteristics of the proposed project and mitigation measures will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-017: Wildlife (In Review)

Your email/letter/comment form has been received and your comment noted. Potential impacts to wildlife from the proposed project and mitigation measures will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-018: NEPA Process (In Review)

Your email/letter/comment form has been received and your comment noted. Tri-State Generation and Transmission Association, Inc. has requested financial assistance from the USDA Rural Utilities Service (RUS), for their anticipated ownership interest in the proposed San Luis Valley – Calumet - Comanche Transmission Project. RUS has

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- such as scheduling irrigation of center pivots so that peak demand concentrations can be minimized? How about support for decentralized center pivot irrigation developing it's own energy source in the pivot corners and redistributing it? This needs to be analyzed as an alternative.
- d. More economic incentives for conservation measures in homes and businesses;
 - e. More use of small-scale distributed systems throughout the SLV and other parts of the state;
 - f. Exploration into locating larger, utility-scale solar facilities closer to energy demand, thereby eliminating or severely lessening the need for transmission infrastructure;
 - g. Further exploration into the idea of locating the proposed transmission line upgrade on the current transmission line siting, thereby eliminating all of the above-mentioned impacts.
 - h. Burying lines in key geographic areas, consult with Native American tribes

In summary, in assessing The Alternative Evaluation and Macro Corridor Study- June 2008, Prepared for Tri-State Generation and Transmission Association, Inc. cited the following rationalizations.

"The primary purpose for the Project would be to:

- Improve system reliability in the San Luis Valley
- Help prevent voltage collapse under peak loads

A new line from a second source would provide redundant service (rather than radial), thus improve the dependability and reliability of the electrical service.

In addition to the purpose for the Project described above, the following additional benefits are related to the Project:

- Provide improved transmission support to the surrounding region
- Provide transmission capacity for renewable energy development in the San Luis Valley."

N-009-034

The Macro Corridor report was very difficult to read and understand. It was not "user friendly" in terms of engaging the public to comment for the benefit of informed decision making. Without going into too much detail, we feel it did not thoroughly explore alternatives nor answer the listed rationale above. It appears to be written to answer the following rationale:

"A new line from a second source would provide redundant service (rather than radial), thus improve the dependability and reliability of the electrical service." It was this sentence that the current Macro Study was written to fulfill.

In conclusion, the calculations given in the Macro Corridor Study, especially regarding the explanation of running the transmission line south into New Mexico, was uncomprehensible to the lay person. This north-south transmission line option has been seriously considered in the past, please develop a more refined and useful explanation as we continue along in the NEPA process, in comparing all the other transmission options, including New Mexico.

N-009-035

Finally, SLVEC and WPC recommend an Environmental Impact Statement (EIS) public process be implemented to address these stated issues that have been raised in these and others comments. Once this transmission line goes in, it's a permanent feature of the landscape, so it is imperative that we get it right. Part of that consideration may mean not building a transmission line at all. Thank you for your time and consideration in reviewing these comments.

determined that funding Tri-State's ownership interest is a federal action requiring analysis under the National Environmental Policy Act (NEPA).

RUS is the lead federal agency for NEPA, and will consult with other federal, state, and local agencies, and affiliated tribes as well as adhere to applicable regulations.

Additional information regarding the NEPA process can be found on the RUS project website at <http://www.usda.gov/rus/water/ees/envIRON.htm>.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at

<http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-019: NEPA Process (In Review)

Your email/letter/comment form has been received and your comment noted. Tri-State Generation and Transmission Association, Inc. has requested financial assistance from the USDA Rural Utilities Service (RUS), for their anticipated ownership interest in the proposed San Luis Valley – Calumet - Comanche Transmission Project. RUS has determined that funding Tri-State's ownership interest is a federal action requiring analysis under the National Environmental Policy Act (NEPA).

RUS is the lead federal agency for NEPA, and will consult with other federal, state, and local agencies, and affiliated tribes as well as adhere to applicable regulations.

Additional information regarding the NEPA process can be found on the RUS project website at <http://www.usda.gov/rus/water/ees/envIRON.htm>.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at

<http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-020: Purpose and Need (In Review)

Your email/letter/comment form has been received and your comment noted. Project purpose and need will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in

Sincerely,

Christine Canaly
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References

1. **Sangre de Cristo National Heritage Area** Feasibility Study, Mimi Mathers, Anne Marie Velasquez, July 8.23.05, Shapins and Associates
2. SLVEC/CSLV/WPC **Solar PEIS Scoping Comments** –September 2009
3. The Wilderness Society **Solar PEIS Comments**-September 2009
4. Western Resource Advocates (WRA) **Tri-State Comments**, September 2009
5. CNE Species Data SLVEC google Earth map review- September 2009
6. **Reviews on Environmental Health**, Volume 23, No. 2, 2008, by Dr. David O. Carpenter and Cindy Sage.
7. **David White Report**–"Seinanyedi: An Ethnographic overview of Great Sand Dunes National Park", David White PhD, April 2005, Internal NPS Document.

late 2010 and will be available at
<http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-021: NEPA Process (In Review)

Your email/letter/comment form has been received and your comment noted. Tri-State Generation and Transmission Association, Inc. has requested financial assistance from the USDA Rural Utilities Service (RUS), for their anticipated ownership interest in the proposed San Luis Valley – Calumet - Comanche Transmission Project. RUS has determined that funding Tri-State's ownership interest is a federal action requiring analysis under the National Environmental Policy Act (NEPA).

RUS is the lead federal agency for NEPA, and will consult with other federal, state, and local agencies, and affiliated tribes as well as adhere to applicable regulations.

Additional information regarding the NEPA process can be found on the RUS project website at <http://www.usda.gov/rus/water/ees/envIRON.htm>. The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at
<http://www.usda.gov/rus/water/ees/ea.htm>.

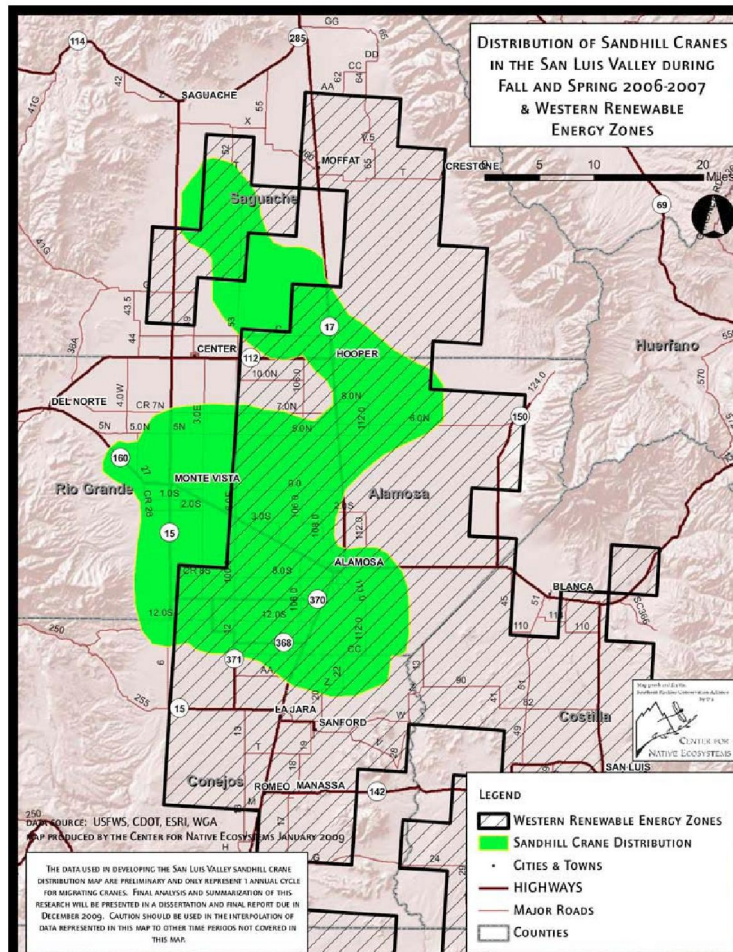
N-009-022: Purpose and Need (In Review)

Your email/letter/comment form has been received and your comment noted. Project purpose and need will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at
<http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-023: Purpose and Need (In Review)

Your email/letter/comment form has been received and your comment noted. Project purpose and need will be addressed in the Environmental Impact Statement.



The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-024: Purpose and Need (In Review)

Your email/letter/comment form has been received and your comment noted. Project purpose and need will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-025: Purpose and Need (In Review)

Your email/letter/comment form has been received and your comment noted. Project purpose and need will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-026: Purpose and Need (In Review)

Your email/letter/comment form has been received and your comment noted. Project purpose and need will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-027: Project Alternatives (In Review)

Your email/letter/comment form has been received and your comment noted. A range of reasonable project alternatives and mitigation measures including the no action alternative will be addressed in the

Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-028: Project Alternatives (In Review)

Your email/letter/comment from has been received and your comment noted. A range of reasonable project alternatives and mitigation measures including the no action alternative will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-029: Project Alternatives (In Review)

Your email/letter/comment from has been received and your comment noted. A range of reasonable project alternatives and mitigation measures including the no action alternative will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-030: Project Alternatives (In Review)

Your email/letter/comment from has been received and your comment noted. A range of reasonable project alternatives and mitigation measures including the no action alternative will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-031: Project Alternatives (In Review)

Your email/letter/comment from has been received and your comment noted. A range of reasonable project alternatives and mitigation measures including the no action alternative will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at

<http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-032: Project Alternatives (In Review)

Your email/letter/comment from has been received and your comment noted. A range of reasonable project alternatives and mitigation measures including the no action alternative will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at

<http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-033: NEPA Process (In Review)

Your email/letter/comment form has been received and your comment noted. Tri-State Generation and Transmission Association, Inc. has requested financial assistance from the USDA Rural Utilities Service (RUS), for their anticipated ownership interest in the proposed San Luis Valley – Calumet - Comanche Transmission Project. RUS has determined that funding Tri-State's ownership interest is a federal action requiring analysis under the National Environmental Policy Act (NEPA). RUS is the lead federal agency for NEPA, and will consult with other federal, state, and local agencies, and affiliated tribes as well as adhere to applicable regulations.

Additional information regarding the NEPA process can be found on the RUS project website at <http://www.usda.gov/rus/water/ees/enviro.htm>.

The Environmental Impact Statement is anticipated to be completed in

late 2010 and will be available at
<http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-034: Project Alternatives (In Review)

Your email/letter/comment from has been received and your comment noted. A range of reasonable project alternatives and mitigation measures including the no action alternative will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at
<http://www.usda.gov/rus/water/ees/ea.htm>.

N-009-035: NEPA Process (In Review)

Your email/letter/comment form has been received and your comment noted. Tri-State Generation and Transmission Association, Inc. has requested financial assistance from the USDA Rural Utilities Service (RUS), for their anticipated ownership interest in the proposed San Luis Valley – Calumet - Comanche Transmission Project. RUS has determined that funding Tri-State's ownership interest is a federal action requiring analysis under the National Environmental Policy Act (NEPA).

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